

DENTONS US LLP
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Attorneys for Chapter 11 Debtor and Debtor
In Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

In re:

BORREGO COMMUNITY
HEALTH FOUNDATION,

Debtor and Debtor In Possession.

Case No. 22-02384

Chapter 11 Case

(Voluntary Petition Filed September 12,
2022)

**DENTONS US LLP'S FOURTEENTH
MONTHLY FEE APPLICATION FOR
ALLOWANCE AND PAYMENT OF
INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OCTOBER 1, 2023
THROUGH OCTOBER 31, 2023**

Judge: Hon. Laura S. Taylor

CSD 1143 (04/28/96)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

DEBTOR: Borrego Community
Health Foundation

PETITION DATE: September 12, 2022

CASE NO.: 22-02384

MONTHLY FEE APPLICATION SUMMARY

APPLICANT: Dentons US LLP

REPRESENTING: Debtor

ORDER APPROVING EMPLOYMENT: Docket No. 292

CATEGORIES	October 1, 2023 – October 31, 2023 (APPLICATION PERIOD)	
	HOURS	AMOUNT REQUESTED
Administration	1.30	\$1,040.00
Case Administration	15.30	\$11,232.70
Asset Analysis and Recovery	0.30	\$240.00
Asset Disposition	6.90	\$5,520.00
Fee / Employment Applications	10.10	\$6,307.80
Assumption / Rejection of Leases and Contracts	0.80	\$606.00
Business Operations	0.40	\$252.00
Financing/Cash Collections	0.60	\$480.00
Claims and Plan	0.20	\$99.90
Claims Administration and Objections	39.10	\$27,805.10
Plan and Disclosure Statement (incl. Business Plan)	104.10	\$72,967.60
DHCS Litigation	10.00	\$6,657.00
Employee Matters	1.40	\$882.00
TOTALS:	190.50	\$134,090.10

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MONTHLY FEE APPLICATION

Dentons US LLP (the “Firm”) submits its *Fourteenth Monthly Fee Application for Allowance and Payment of Interim Compensation and Reimbursement of Expenses for the Period October 1, 2023 – October 31, 2023* for services rendered during the chapter 11 case (this “Case”) of the above-captioned debtor (the “Debtor”) for the Debtor. In support of the foregoing application (the “Application”), the Firm respectfully represents as follows:

1. The Firm is bankruptcy counsel to the Debtor. The Firm hereby applies to the Court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the period of October 1, 2023 – October 31, 2023 (the “Application Period”).

2. The Firm billed a total of \$135,695.10 in fees and expenses during the Application Period. The total fees represent 190.50 hours expended during the period covered by this Application. These fees and expenses break down as follows:

Application Period	Fees	Expenses	Total
October 1, 2023 – October 31, 2023	\$134,090.10	\$1,605.00	\$135,695.10

3. Accordingly, the Firm seeks allowance of interim compensation in the amount of a total of \$108,877.08 at this time. This total is comprised as follows: \$107,272.08 (80% of the fees for services rendered), plus \$1,605.00 (100% of the expenses incurred).

4. Attached as **Exhibit “1”** hereto is the name of each professional who performed services in connection with these cases during the period covered by this Application and the hourly rate for each such professional. Attached hereto as **Exhibit “2”** are the detailed time and expense statements for the Application Period.

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1 5. The Firm has served a copy of this Application on the Office of the
2 United States Trustee (the “U.S. Trustee”), the Debtor, counsel to the Debtor, counsel
3 to the Patient Care Ombudsman, and counsel to the Official Committee of Unsecured
4 Creditors appointed in this Case. The Application was mailed by first class mail,
5 postage prepaid, on or about December 4, 2023. Notice of the filing of this
6 Application was served on the foregoing parties as well as any party who has
7 requested special notice in this Case as of the date of the Notice. The Notice was
8 mailed by first class mail, postage prepaid, on or about December 4, 2023.

9 6. Pursuant to this Court’s *Order On Debtor’s Notice Of Motion And*
10 *Motion for Entry Of An Order Establishing Procedures For Monthly Payment Of*
11 *Fees And Expense Reimbursement* entered on December 15, 2022 (the “Order
12 Establishing Monthly Fee Procedures”) [Docket No. 299], the Debtor is authorized
13 to make the payment requested herein without a further hearing or order of this Court
14 unless an objection to this Application is filed with the Court and served upon the
15 Notice Parties within ten (10) calendar days after the date of mailing of the Notice of
16 this Application. If such an objection is filed, the Debtor is authorized to pay 80%
17 of the uncontested fees and 100% of the uncontested expenses without further order
18 of the Court. If no objection is filed, the Debtor is authorized to pay 80% of all fees
19 requested in the Application and 100% of the uncontested expenses without further
20 order of the Court.

21 7. The interim compensation and reimbursement of expenses sought in this
22 Application is not final. Upon the conclusion of this Case, the Firm will seek fees
23 and reimbursement of the expenses incurred for the totality of the services rendered
24 in this Case. Any interim fees or reimbursement of expenses approved by this Court
25 and received by the Firm (along with any retainer) will be credited against such final
26 fees and expenses as may be allowed by this Court.

1 **WHEREFORE**, the Firm respectfully requests that the Debtor pay
2 compensation to the Firm as requested herein pursuant to and in accordance with the
3 terms of the Order Establishing Monthly Fee Procedures.

4 Dated: December 4, 2023

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

7 By /s/ Tania M. Moyron
 Tania M. Moyron

8 Attorneys for the Chapter 11 Debtor and
9 Debtor In Possession

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EXHIBIT “1”

**(Summary of Hours by Professional for
Application Period October 1, 2023 – October 31, 2023)**

Name of Professional	Title	Hours	Rate	Total Billed
John Harrington	Partner	1.30	\$800.00	\$1,040.00
Samuel R. Maizel	Partner	16.80	\$800.00	\$13,440.00
Tania M. Moyron	Partner	26.90	\$800.00	\$21,520.00
Geoffrey M. Miller	Partner	35.70	\$729.00	\$26,025.30
Lauren Macksoud	Partner	15.90	\$729.00	\$11,591.10
Robert Richards	Partner	1.70	\$800.00	\$1,360.00
Sandra McCandless	Partner	7.30	\$800.00	\$5,840.00
John A. Moe, II	Partner	8.10	\$720.00	\$5,832.00
Rebecca M. Wicks	Senior Managing Associate	73.20	\$630.00	\$46,116.00
Samantha Ruben	Associate	0.60	\$499.50	\$299.70
George L. Medina	Senior Paralegal	3.00	\$342.00	\$1,026.00
Totals:		190.50		\$134,090.10

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EXHIBIT “2”

**(Detailed Time and Expense Statements for
Application Period October 1, 2023 – October 31, 2023)**

DENTONS US LLP
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The logo for Dentons, featuring the word "DENTONS" in white capital letters inside a purple arrow-shaped box pointing to the right.

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SNR Denton US LLP
601 S. Figueroa Street
Suite 2500
Los Angeles, California 90017-5704

dentons.com

Isaac Lee
Chief Restructuring Officer
Borrego Community Health Foundation
isaac.lee@ankura.com

November 30, 2023

Invoice No. 2687822

Client: 15810746

Payment Due Upon Receipt

Total This Invoice	\$ 135,695.10
Amounts Received, Available to Apply Against Current or Future Invoices	100,000.00
Amount Due	\$ 135,695.10

Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP
8000 Sears Tower
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP
Attention: Accounting
233 South Wacker Drive
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank
227 W Monroe, Chicago, IL 60606
ABA Transit # 271070801
Account # 0801051693
Account Name: Dentons US LLP
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel
at 1 213 623 9300

Isaac Lee
Chief Restructuring Officer
Borrego Community Health Foundation
isaac.lee@ankura.com

November 30, 2023

Invoice No. 2687822

For Professional Services Rendered through October 31, 2023:

Matter: 15810746-000002
Postpetition

B100 - Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
10/03/23	J. Harrington	1.30	1,040.00	B100	Review trust and subtrust agreement; analyze potential US tax issues; discuss same with T. Moyron.
	Subtotal	1.30	1,040.00		

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	S. Maizel	0.10	80.00	B110	Review and respond to emails re KPC loan obligation to BCHF.
10/03/23	T. Moyron	0.60	480.00	B110	Participate in legal status call, including plan matters, audit, etc.
10/03/23	G. Miller	0.30	218.70	B110	Emails with M. Reynolds and C. Pease re payment of Blue Shield cure costs.
10/03/23	S. Maizel	0.60	480.00	B110	Zoom conference with I. Lee, etc. re pending legal issues.
10/04/23	S. Maizel	0.20	160.00	B110	Review procedural tentative rulings re upcoming hearing.
10/04/23	T. Moyron	0.10	80.00	B110	Review procedural tentative rulings re upcoming hearing.
10/04/23	R. Wicks	0.10	63.00	B110	Analyze procedural tentative rulings issued by the court.
10/04/23	T. Moyron	0.50	400.00	B110	Conference call with S. Maizel regarding DS and plan and proposed structure and upcoming fee hearings.
10/06/23	T. Moyron	0.50	400.00	B110	Call with R. Wicks regarding pending matters, including plan, Ankura reports, DHCS stipulation.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/06/23	R. Wicks	0.50	315.00	B110	Call with T. Moyron analyzing plan and disclosure statement, Ankura compensation report, and DHCS stipulation.
10/06/23	G. Miller	0.60	437.40	B110	Call with T. Moyron and R. Wicks re Liquidating Trust and Combined Plan and Disclosure Statement.
10/08/23	G. Miller	2.50	1,822.50	B110	Prepare Liquidation Trust Agreement.
10/08/23	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
10/09/23	G. Medina	0.60	205.20	B110	Correspond with R. Wicks and edit stipulation with Allure Dental Associates and send to R. Wicks for review (0.2); file stipulation and upload order (0.4).
10/10/23	G. Medina	0.20	68.40	B110	Address upcoming calendar dates with docketing.
10/10/23	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
10/10/23	T. Moyron	1.00	800.00	B110	Participate in legal status call with R. MacIsaac, I. Lee, J. Kearney, et al., regarding pending matters, including chapter 11 plan matters and order, billing, and other matters.
10/10/23	R. Wicks	0.30	189.00	B110	Review orders entered by court approving stipulation, extending exclusivity, and approving fee applications.
10/10/23	S. Maizel	0.80	640.00	B110	Telephone conference with T. Moyron re pending issues.
10/11/23	S. Maizel	0.60	480.00	B110	Zoom conference with R. MacIsaac, I. Lee, J. LaMagna, etc. re Medicare billing concerns.
10/17/23	T. Moyron	0.30	240.00	B110	Participate in legal status update call regarding pending matters, including DAP, deposits, and related matters.
10/17/23	S. Maizel	0.40	320.00	B110	Zoom conference with I. Lee, R. MacIsaac, etc. re pending issues.
10/18/23	R. Wicks	0.10	63.00	B110	Correspond with A. Guerra regarding service of order issued in case.
10/23/23	R. Wicks	0.10	63.00	B110	Correspond with I. Lee to discuss Medi-cal receipts and POR updates.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/24/23	S. Maizel	0.50	400.00	B110	Zoom conference with R. MacIssac, I. Lee, etc., re pending legal issues.
10/24/23	T. Moyron	0.50	400.00	B110	Zoom conference with R. MacIssac, I. Lee, et al., regarding pending legal issues.
10/25/23	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
10/26/23	G. Miller	1.30	947.70	B110	Draft liquidating trust agreement.
10/31/23	S. Ruben	0.10	49.95	B110	Analyze docket for orders to monitor compliance with case notices.
10/31/23	S. Maizel	0.60	480.00	B110	Telephone conference with T. Moyron re Feldesman Tucker Leifer Fidell LLP additional representation (.1); telephone conference with T. Waters and T. Moyron re same (.3); review and respond to emails re same (.2).
10/31/23	S. Maizel	0.70	560.00	B110	Zoom conference with R. MacIlsaac, I. Lee, etc. re pending legal issues.
10/31/23	S. Maizel	0.30	240.00	B110	Review and respond to emails re DAP CHOWs.
	Subtotal	15.30	11,232.70		

B120 - Asset Analysis and Recovery

Date	Timekeeper	Hours	Amount	Task	Narrative
10/11/23	S. Maizel	0.30	240.00	B120	Review and respond to emails re ARPA report for Riverside County.
	Subtotal	0.30	240.00		

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

B130 - Asset Disposition

Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/23	T. Moyron	0.40	320.00	B130	Analyze proposed correspondence regarding CHOW to CHOW and comments thereto (.1); provide additional comment (.1); correspond with J. LaMagna, et al., re same and analyze related emails (.2).
10/24/23	T. Moyron	1.00	800.00	B130	Zoom conference regarding matters related to closing and CHOW (.5); analyze related emails from J. LaMagna, et al. re post-closing matters (.5).
10/24/23	S. Maizel	0.40	320.00	B130	Zoom conference re continuing closing issues.
10/24/23	S. Maizel	0.50	400.00	B130	Review and respond to emails re post-closing issues to be resolved.
10/25/23	S. Maizel	0.60	480.00	B130	Zoom conference with I. Lee, etc. re DAP Health and CHOW issues (.4); review and respond to emails re same (.2).
10/25/23	T. Moyron	0.20	160.00	B130	Analyze email from J. LaMagna re DAP responses to open issues (.1); prepare email to J. LaMagna regarding call (.1).
10/26/23	T. Moyron	0.30	240.00	B130	Analyze J. LaMagna, et al., emails regarding post-sale and billing matters (.2); analyze additional emails regarding same from Hanson Bridget (.1).
10/27/23	T. Moyron	1.30	1,040.00	B130	Telephone conference with HLB counsel regarding DAP CHOW submissions and related issues(.4); zoom conference with D. Habig, et al., regarding same (.6); analyze correspondence regarding DAP CHOW status and related matters (.3).
10/27/23	T. Moyron	0.30	240.00	B130	Analyze proposed correspondence to DAP from S. Maizel, and related emails re CHOW.
10/27/23	S. Maizel	1.60	1,280.00	B130	Telephone conference with HLB attorneys, etc. re DAP CHOW submissions, etc. (.4); zoom conference with D. Habig, etc. re same (.6); research re FQHC standards re CHOW (.3); review and revise correspondence re DAP CHOW status (.3).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/30/23	S. Maizel	0.30	240.00	B130	Review and respond to emails re DAP submission of CHOWs.
	Subtotal	6.90	5,520.00		

B160 - Fee/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	R. Wicks	0.20	126.00	B160	Call with CJ Pease regarding compensation for reconstituted board.
10/03/23	R. Wicks	0.20	126.00	B160	Correspond with J. Kearney regarding second interim fee applications.
10/04/23	R. Wicks	0.10	63.00	B160	Call with T. Moyron regarding supplement to second interim fee application.
10/04/23	R. Wicks	0.20	126.00	B160	Correspond with T. Moyron and S. Maizel regarding upcoming hearing on fee applications.
10/04/23	T. Moyron	0.20	160.00	B160	Call with R. Wicks regarding supplement to second interim fee application (.1); correspond with R. Wicks, et al., re hearing on fee applications (.1).
10/05/23	S. Maizel	0.10	80.00	B160	Review and respond to emails re court orders re fee applications.
10/05/23	R. Wicks	2.00	1,260.00	B160	Prepare notice regarding second interim fee application.
10/05/23	R. Wicks	0.30	189.00	B160	Review tentative rulings granting fee applications.
10/05/23	R. Wicks	0.20	126.00	B160	Correspond with T. Moyron and S. Maizel regarding tentative ruling granting Dentons fee application.
10/05/23	R. Wicks	0.40	252.00	B160	Prepare proposed order granting Dentons second interim fee application.
10/06/23	T. Moyron	0.30	240.00	B160	Analyze order authorizing fees and costs (.1) and correspond with S. Maizel, et al., re same (.2).
10/06/23	G. Medina	0.30	102.60	B160	Correspond with R. Wicks and edit and upload order granting DUS fee application.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/06/23	R. Wicks	0.30	189.00	B160	Prepare and finalize order granting Dentons second interim fee application.
10/06/23	R. Wicks	0.20	126.00	B160	Correspond with CJ Pease, I. Lee, et. al regarding Ankura September compensation report.
10/10/23	R. Wicks	0.30	189.00	B160	Prepare order on Hooper Lundy second interim fee application.
10/10/23	S. Maizel	0.20	160.00	B160	Review and respond to emails re PCO final fee applications.
10/11/23	R. Wicks	0.20	126.00	B160	Prepare order on Hooper Lundy second interim fee application.
10/11/23	R. Wicks	0.10	63.00	B160	Correspond with J. Pomerantz regarding order approving stipulation to resolve Dr. Shah claim.
10/12/23	R. Wicks	0.10	63.00	B160	Correspond with I. Lee regarding preparing Ankura August compensation report.
10/12/23	R. Wicks	0.40	252.00	B160	Prepare Ankura August compensation report.
10/12/23	R. Wicks	0.20	126.00	B160	Correspond with G. Medina regarding finalizing and filing Ankura August compensation report.
10/12/23	G. Medina	0.60	205.20	B160	Correspond with R. Wicks and prepare, assemble and file Ankura August staffing and compensation report.
10/13/23	R. Wicks	0.10	63.00	B160	Correspond with US Trustee regarding Ankura Ledes files.
10/25/23	R. Wicks	0.10	63.00	B160	Correspond with T. Reid regarding Hooper Lundy August and September fee applications.
10/25/23	T. Moyron	0.10	80.00	B160	Analyze email from B. Dassa regarding order approving FTI fees and send same to CJ Pease and I. Lee.
10/27/23	R. Wicks	1.10	693.00	B160	Prepare Hooper Lundy August fee application and notice.
10/27/23	R. Wicks	1.00	630.00	B160	Prepare Hooper Lundy September fee application and notice.
10/30/23	R. Wicks	0.30	189.00	B160	Prepare August and September monthly fee applications for Hooper Lundy and respective notices.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/23	S. Maizel	0.30	240.00	B160	Review and respond to correspondence re secured tax bill.
	Subtotal	10.10	6,307.80		

B185 - Assumption/Rejection of Leases and Contracts

Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/23	T. Moyron	0.60	480.00	B185	Analyze issues related to stipulation and resolution of rejection damages re Wermers (.1); analyze calculation of rejection damages (.1); analyze emails from Counsel, CJ Pease, regarding same (.2); correspond with R. Wicks re stipulation, damages, etc. (.2).
10/30/23	R. Wicks	0.20	126.00	B185	Analyze settlement proposal from J. Wermers regarding rejection damages claim.
	Subtotal	0.80	606.00		

B210 - Business Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	R. Wicks	0.10	63.00	B210	Correspond with CJ Pease and C. Dougherty regarding September bank statements and July monthly operating report.
10/17/23	R. Wicks	0.10	63.00	B210	Correspond with T. Moyron and CJ Pease regarding CHOW issues.
10/18/23	R. Wicks	0.20	126.00	B210	Correspond with CJ Pease, T. Moyron, and I. Lee regarding outstanding issues including CHOW and Medi-cal receipts.
	Subtotal	0.40	252.00		

B230 - Financing/Cash Collections

Date	Timekeeper	Hours	Amount	Task	Narrative
10/11/23	S. Maizel	0.60	480.00	B230	Review emails re status of claims objections (.2); zoom conference re claims objections (.4).
	Subtotal	0.60	480.00		

Borrego Community Health Foundation
 Matter: 15810746-000002
 Invoice No.: 2687822

November 30, 2023

B300 - Claims and Plan

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	S. Ruben	0.20	99.90	B300	Correspond with R. Wicks re Aldairi complaint.
	Subtotal	0.20	99.90		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
09/28/23	T. Moyron	0.30	240.00	B310	Analyze Vitamin D objection and comment (.2); and correspond with L. Macksoud re same (.1).
10/02/23	R. Wicks	0.40	252.00	B310	Call with L. Macksoud regarding preparing dentist defendant claim objections.
10/02/23	R. Wicks	0.20	126.00	B310	Review T. Moyron's comments to Vitamin D claim objection.
10/02/23	R. Wicks	0.20	126.00	B310	Review filed objections to claims.
10/02/23	R. Wicks	0.30	189.00	B310	Correspond with L. Macksoud, T. Moyron, and S. McCandless regarding Vitamin D claim objection.
10/02/23	R. Wicks	0.30	189.00	B310	Review T. Moyron's comments to Vitamin D Claim Objection.
10/02/23	R. Wicks	1.30	819.00	B310	Research potential waiver of confidentiality protections by filing proof of claim.
10/02/23	R. Wicks	0.60	378.00	B310	Review and analyze non-bankruptcy complaints in connection with preparing claim objections.
10/02/23	R. Wicks	0.10	63.00	B310	Correspond with S. Ruben regarding non-bankruptcy litigation in connection with claim objections.
10/02/23	R. Wicks	0.30	189.00	B310	Correspond with L. Macksoud regarding dentist defendant claims and pulling related documents.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	L. Macksoud	1.40	1,020.60	B310	Call with R. Wicks to discuss dental litigation claims (.5) and attention to drafting same (.5); confer with T. Moyron and S. McCandless regarding Vitamin D objection and potential information regarding confidential employee information (.3); draft email to committee counsel re same (.1).
10/02/23	S. McCandless	1.30	1,040.00	B310	Initial review and analysis of Objection to Vitamin D contractor claim and related documentation (.90); communicate with T. Moyron and L Macksoud regarding potential privacy implications of current version of Objection to Vitamin D claim (.40).
10/02/23	T. Moyron	0.30	240.00	B310	Correspond with L. Macksoud, et al., regarding Vitamin D objection.
10/03/23	S. McCandless	1.90	1,520.00	B310	Review complaint and proof of claim for privacy analysis of current version of objection to proof of claim (.90); review detailed information and case research received from R. Wicks as background to same (1.00).
10/03/23	L. Macksoud	2.60	1,895.40	B310	Confer with KCC regarding Proofs of Claim filed under seal and request to access same (.4); review unredacted claim (.3) and draft objection to New Millennium claim (1.5); confer with R. Wicks regarding additional research for Vitamin D claim objection and for New Millennium objection (.4).
10/03/23	T. Moyron	0.30	240.00	B310	Analyze objections for filing and correspond regarding same with J. Pomerantz, et al.
10/03/23	R. Wicks	0.20	126.00	B310	Call with L. Macksoud regarding Vitamin D claim objection.
10/03/23	R. Wicks	1.20	756.00	B310	Research waiver of confidentiality by filing proof of claim.
10/03/23	R. Wicks	0.30	189.00	B310	Review draft dentist defendant claim objection.
10/04/23	L. Macksoud	1.00	729.00	B310	Call with CJ Pease to discuss dental litigation claims and objections thereto (.5); further review claims analysis and spread sheet of supporting information and confer with R. Wicks re same (.5).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/04/23	R. Wicks	0.20	126.00	B310	Correspond with L. Macksoud regarding claim objections for dentist defendant claims.
10/05/23	R. Wicks	0.20	126.00	B310	Analyze claims reconciliation prepared by CJ Pease.
10/05/23	R. Wicks	0.30	189.00	B310	Call with L. Macksoud regarding defendant dentist claim objections.
10/05/23	R. Wicks	0.20	126.00	B310	Analyze S. McCandless discussion of confidentiality in Vitamin D claim objection.
10/05/23	R. Wicks	0.10	63.00	B310	Correspond with L. Macksoud regarding preparing claim objections.
10/05/23	R. Wicks	0.20	126.00	B310	Correspond with B. Dassa and CJ Pease regarding finalizing claim objection.
10/05/23	L. Macksoud	0.90	656.10	B310	Emails with S. McCandless regarding Vitamin D claim (.3); call with R. Wicks regarding dental claim objections (.4) and draft email to T. Moyron and S. Maizel regarding same (.2).
10/05/23	S. McCandless	2.90	2,320.00	B310	Provide detailed response to Dentons team regarding current draft of Objection to Vitamin D claim in context of privacy concerns and propose revisions to same (1.60); further related detailed review and analysis of current draft of Objection and related Complaint and other background information for revisions to same (1.00); further communicate with L. Macksoud regarding same (.30).
10/06/23	S. McCandless	1.20	960.00	B310	Telephone call with L. Macksoud regarding privacy issues posed by current draft of Vitamin D objection (.70); prepare for same (.30); communicate with L. Macksoud and Dentons team following same (.20).
10/06/23	L. Macksoud	1.70	1,239.30	B310	Emails with committee and working group on various pools of claims objections (.6); follow up with J. Pomerantz re same (.2); call with S. McCandless regarding employee issues in Vitamin D claim objection (.5); confer with T. Moyron re same (.2) and communicate with committee counsel regarding claim objection (.2).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/06/23	R. Wicks	0.10	63.00	B310	Correspond with CJ Pease and L. Macksoud regarding Vitamin D claim.
10/06/23	R. Wicks	0.10	63.00	B310	Correspond with L. Macksoud and T. Moyron regarding claim objections.
10/06/23	R. Wicks	0.20	126.00	B310	Correspond with T. Moyron, S. Golden, J. Pomerantz, et. al regarding claims reconciliation, including Vitamin D claim objection.
10/09/23	R. Wicks	0.30	189.00	B310	Prepare order approving Dr. Shah stipulation resolving claim.
10/09/23	L. Macksoud	0.50	364.50	B310	Confer with C. Pease regarding claim objections.
10/10/23	L. Macksoud	2.20	1,603.80	B310	Calls and emails with J. Pomerantz regarding Vitamin D objection and draft email to CJ Pease regarding follow up.
10/11/23	R. Wicks	0.10	63.00	B310	Analyze chart of litigation defendant claims sent by T. Moyron.
10/11/23	R. Wicks	0.30	189.00	B310	Call with L. Macksoud, T. Moyron, and S. Maizel regarding dental claim objections.
10/11/23	L. Macksoud	0.70	510.30	B310	Confer with Ankura regarding additional information required to analyze claims (.2); emails with committee counsel regarding same (.2); call with Dentons working group to discuss dentist claim objections (.3).
10/11/23	T. Moyron	0.30	240.00	B310	Zoom meeting with L. Macksoud, et al., regarding claim objections and related issues.
10/12/23	T. Moyron	0.10	80.00	B310	Analyze email from L. Macksoud re claim objections and next steps.
10/12/23	L. Macksoud	1.80	1,312.20	B310	Further draft objection to dentist claims, review complaint and confer with R. Wicks regarding research needed for objection.
10/12/23	R. Wicks	0.20	126.00	B310	Correspond with L. Macksoud regarding objection to dental defendant claim.
10/12/23	R. Wicks	0.50	315.00	B310	Review draft claim objection to dentist defendant claim.
10/13/23	R. Wicks	1.50	945.00	B310	Research supporting case law for dentist defendant claim objection.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/13/23	R. Wicks	0.60	378.00	B310	Prepare dentist defendant claim objection with additional supporting case law.
10/16/23	R. Wicks	0.20	126.00	B310	Analyze T. Cazares claim reconciliations.
10/17/23	R. Wicks	0.30	189.00	B310	Correspond with T. Moyron and L. Macksoud regarding claim objections to defendant dentists.
10/17/23	R. Wicks	0.20	126.00	B310	Analyze claims payment data from D. Wessel regarding dentists.
10/17/23	R. Wicks	0.10	63.00	B310	Correspond with H. Hammi regarding potential stipulation to settle J. Wermers rejection claim.
10/17/23	L. Macksoud	1.20	874.80	B310	Review case law provided by R. Wicks (.6) and finalize draft objection (.5); draft email to T. Moyron and S. Maizel re same (.1).
10/17/23	L. Macksoud	0.50	364.50	B310	Review email and reconciliation schedules for various claims as provided by Ankura.
10/18/23	R. Wicks	0.40	252.00	B310	Analyze potential stipulation to resolve J. Wermer's rejection claim.
10/19/23	L. Macksoud	0.50	364.50	B310	Review additional information re claims provided by DOJ.
10/19/23	R. Wicks	0.30	189.00	B310	Analyze claims reconciliation of J. Wermers rejection damages claim.
10/19/23	R. Wicks	0.20	126.00	B310	Correspond with H. Hammi regarding J. Wermers rejection damages claim.
10/19/23	R. Wicks	0.50	315.00	B310	Analyze HIPAA issues related to potential claim objections for dentist claims.
10/23/23	R. Wicks	0.10	63.00	B310	Correspond with M. Gray, T. Moyron, et. al regarding Douglas Ness claim objection.
10/24/23	R. Wicks	0.10	63.00	B310	Review notice of withdrawal of Blue Cross Blue Shield claim.
10/25/23	L. Macksoud	0.30	218.70	B310	Review email and attached spreadsheet from C. Pease regarding Vitamin D claim.
10/27/23	R. Wicks	0.10	63.00	B310	Analyze T. Cazares claim's reconciliations.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/30/23	T. Moyron	0.80	640.00	B310	Correspond with L. Macksoud regarding call to discuss Vitamin D and claims (.2); call with L. Macksoud and R. Wicks regarding same and analyze related issues (.4); analyze prior emails and issues related to Vitamin D objection and potential resolution (.2).
10/30/23	R. Wicks	0.40	252.00	B310	Call with T. Moyron and L. Macksoud regarding Vitamin D claim objections and defendant dentist claim objections.
10/30/23	R. Wicks	0.20	126.00	B310	Correspond with L. Macksoud regarding dentist defendant claim objections.
10/30/23	R. Wicks	0.20	126.00	B310	Correspond with J. Kearney, L. Macksoud, et. al regarding dentist defendant claim objections.
10/30/23	L. Macksoud	0.60	437.40	B310	Confer with C. Pease regarding various claims (.2); call with T. Moyron and R. Wicks to discuss claim objection strategies (.4).
Subtotal		39.10	27,805.10		

B320 - Plan and Disclosure Statement (incl. Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	T. Moyron	0.20	160.00	B320	Correspond with S. Golden, et al., regarding plan.
10/02/23	G. Miller	4.50	3,280.50	B320	Draft combined plan and disclosure statement.
10/02/23	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron, S. Golden, et. al regarding setting time to discuss plan and liquidating trust agreement.
10/03/23	T. Moyron	1.80	1,440.00	B320	Teams meeting with Ankura, S. Maizel, et al., regarding structure proposed by Committee in plan and trust agreements (.7); correspond with R. Richards regarding proposed structure including tax implication (.1); call with J. Harrington regarding same (.1); further analysis of plan matters and proposed structure (.8); correspond with R. Wicks, et al., regarding motion to shorten time (.1).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/03/23	R. Wicks	0.20	126.00	B320	Correspond with G. Medina regarding order uploaded for motion to shorten time.
10/03/23	R. Wicks	0.10	63.00	B320	Correspond with D. Kalve regarding order uploaded for motion to shorten time.
10/03/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron, R. MacIsaac, et. al regarding motion to shorten time.
10/03/23	R. Richards	1.30	1,040.00	B320	Review liquidating trust agreement and redline of changes in subtrust agreement (0.7); review Chapter 11 plan markup (0.4); emails re tax analysis of subtrust (0.2).
10/03/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron, I. Lee, et. al regarding liquidating trust agreement and structure.
10/03/23	G. Miller	4.50	3,280.50	B320	Draft combined plan and disclosure statement.
10/03/23	G. Medina	0.20	68.40	B320	Correspond with R. Wicks regarding Order on Motion to shorten time and review docket.
10/03/23	S. Maizel	1.70	1,360.00	B320	Zoom conference with Ankura re plan provisions on trust (.7); review draft combined plan and disclosure statement (1.0).
10/04/23	S. Maizel	0.50	400.00	B320	Telephone conference with T. Moyron re plan preparation.
10/04/23	T. Moyron	0.30	240.00	B320	Correspond with R. Wicks, et al., re combined plan and disclosure statement (.1); correspond with S. Rinaldi re proposed plan structure (.2).
10/04/23	G. Miller	1.20	874.80	B320	Prepare combined plan and disclosure statement.
10/04/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron and G. Miller regarding combined plan and disclosure statement.
10/04/23	T. Moyron	0.40	320.00	B320	Analyze email from Ankura regarding sub-trust proposal (.1) and respond to same (.1); attention to status of combined DS and plan (.2).
10/05/23	R. Wicks	1.50	945.00	B320	Prepare order on motion for shortened time.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/05/23	R. Wicks	0.10	63.00	B320	Call with T. Moyron regarding preparing order on motion for order shortening time.
10/05/23	R. Wicks	0.50	315.00	B320	Call with T. Moyron, S. Golden, et. al. regarding liquidating plan and trust agreement.
10/05/23	G. Miller	1.60	1,166.40	B320	Draft combined plan and disclosure statement.
10/05/23	G. Medina	0.30	102.60	B320	Correspond with R. Wicks and edit and send proposed order on motion to shorten time.
10/05/23	T. Moyron	1.30	1,040.00	B320	Zoom meeting with S. Golden, C. Zucker, I. Lee, et al., regarding proposed plan structure (.5); teams meeting with Ankura team re same (.4); call with C. Zucker re plan structure (.3); follow-up calls with I. Lee re plan structure (.1).
10/05/23	T. Moyron	0.50	400.00	B320	Conference call with Courtroom Deputy re order on OST re combined DS and Plan (.1); analyze and provide comments on order (.2); call and correspond with R. Wicks regarding same (.2).
10/05/23	T. Moyron	0.10	80.00	B320	Analyze email from Lauren re claim objections and next steps and respond to same.
10/06/23	R. Wicks	0.20	126.00	B320	Analyze co-trustee structure for combined plan and disclosure statement from S. Rinaldi.
10/06/23	R. Wicks	0.40	252.00	B320	Call with T. Moyron and G. Miller regarding combined chapter 11 plan and disclosure statement and liquidating trust agreement.
10/06/23	T. Moyron	0.70	560.00	B320	Correspondence with Ankura, S. Golden, et al., re updated plan (.2); call with I. Lee re same (.1); zoom meeting with G. Miller and R. Wicks regarding updating combined DS and Plan, including language with respect to co-trustee (.4).
10/08/23	R. Wicks	2.00	1,260.00	B320	Prepare combined disclosure statement and plan to remove sub-trust concept.
10/09/23	R. Wicks	2.70	1,701.00	B320	Prepare combined disclosure statement and plan to incorporate co-trustee concept.
10/09/23	G. Miller	8.70	6,342.30	B320	Draft Liquidating Trust Agreement.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/09/23	T. Moyron	0.50	400.00	B320	Analyze updated plan structure, including OC, co-trustees, and other changes (.3); correspond with R. Wicks re same (.2).
10/10/23	G. Miller	2.20	1,603.80	B320	Draft liquidating trust agreement.
10/10/23	T. Moyron	0.30	240.00	B320	Call with R. Wicks regarding plan and other matters.
10/10/23	R. Wicks	2.20	1,386.00	B320	Prepare combined plan and disclosure statement to include co-trustee concept.
10/10/23	R. Wicks	0.10	63.00	B320	Call with T. Moyron regarding status of combined disclosure statement and chapter 11 plan.
10/10/23	R. Wicks	0.50	315.00	B320	Prepare order granting third motion to extend exclusivity.
10/10/23	R. Wicks	0.20	126.00	B320	Review order granting motion for shortened time.
10/10/23	R. Wicks	0.10	63.00	B320	Correspond with R. MacIsaac et al regarding order granting motion to shorten time.
10/10/23	G. Medina	0.40	136.80	B320	Correspond with R. Wicks and edit order on third exclusivity motion and upload.
10/11/23	G. Miller	1.30	947.70	B320	Draft Liquidating Trust Agreement.
10/12/23	R. Wicks	1.30	819.00	B320	Prepare combined chapter 11 plan and disclosure statement.
10/13/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron, S. Maizel, and G. Miller regarding combined disclosure statement and plan.
10/13/23	G. Miller	0.60	437.40	B320	Review revised combined plan and disclosure statement.
10/13/23	G. Miller	1.00	729.00	B320	Draft liquidating trust agreement.
10/14/23	G. Miller	2.40	1,749.60	B320	Draft liquidating trust agreement.
10/15/23	R. Wicks	0.10	63.00	B320	Correspond with S. Maizel regarding comments to combined chapter 11 plan and disclosure statement.
10/15/23	S. Maizel	2.00	1,600.00	B320	Review and prepare combined plan and disclosure statement.
10/16/23	S. Maizel	0.70	560.00	B320	Review draft combined plan and disclosure statement.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/16/23	T. Moyron	1.30	1,040.00	B320	Analyze redline of plan (.3); analyze S. Maizel comments (.2); analyze updated plan and provide comment (.8).
10/16/23	R. Wicks	0.60	378.00	B320	Analyze comments to combined plan and disclosure statement from S. Maizel.
10/16/23	R. Wicks	2.00	1,260.00	B320	Prepare combined chapter 11 disclosure statement and plan by incorporating S. Maizel's comments.
10/16/23	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron and S. Maizel regarding combined plan and disclosure statement.
10/17/23	R. Wicks	0.30	189.00	B320	Correspond with J. Moe, T. Moyron, and S. Maizel regarding solicitation procedures motion.
10/18/23	R. Wicks	0.20	126.00	B320	Correspond with J. Moe regarding preparing ballots, notices, and solicitation procedures motion.
10/18/23	R. Wicks	1.10	693.00	B320	Prepare solicitation procedures motion.
10/18/23	J.A. Moe, II	0.40	288.00	B320	Confer with R. Wicks on solicitation and creation of ballots (.10); research form of Ballots (.30).
10/19/23	J.A. Moe, II	1.50	1,080.00	B320	Additional review of form of Ballots (.10); telephone conference with attorneys S. Maizel, T. Moyron and R. Wicks on preparation of and soliciting a Plan Of Liquidation (.30); overall review of the proposed combined Disclosure Statement and Plan Of Liquidation (.10); review, annotate and flag the combined Disclosure Statement and Plan Of Liquidation (1.00).
10/19/23	G. Miller	2.00	1,458.00	B320	Draft liquidating trust agreement.
10/19/23	R. Wicks	0.30	189.00	B320	Correspond with T. Moyron, G. Miller, et. al regarding liquidating trust agreement and combined plan and disclosure statement.
10/19/23	R. Wicks	0.30	189.00	B320	Call with T. Moyron, J. Moe, and S. Maizel regarding solicitation materials.
10/19/23	R. Wicks	2.50	1,575.00	B320	Prepare motion for approval of solicitation procedures.
10/19/23	R. Wicks	0.10	63.00	B320	Review voicemail from J. Moe regarding solicitation procedures motion.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/23	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron, J. Moe, and S. Maizel regarding setting time to discuss solicitation procedures motion.
10/19/23	S. Maizel	0.30	240.00	B320	Zoom conference with J. Moe, T. Moyron, etc. re solicitation planning for plan.
10/19/23	T. Moyron	1.30	1,040.00	B320	Prepare further updates and changes to plan of liquidation.
10/19/23	T. Moyron	0.50	400.00	B320	Correspond with G. Miller regarding updated liquidating trust agreement (.2); analyze redline of updated liquidating trust agreement (.3).
10/20/23	R. Wicks	0.50	315.00	B320	Analyze proposed changes to liquidating trust agreement.
10/20/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron, B. Richards, et. al regarding tax consequences of plan and liquidating trust agreement.
10/20/23	R. Richards	0.40	320.00	B320	Review markup of liquidating trust agreement.
10/23/23	R. Wicks	2.10	1,323.00	B320	Prepare proposed order granting motion to combine plan and disclosure statement.
10/23/23	R. Wicks	0.10	63.00	B320	Correspond with J. Moe regarding ballots and notices.
10/23/23	R. Wicks	1.10	693.00	B320	Prepare solicitation procedures motion.
10/23/23	T. Moyron	0.20	160.00	B320	Correspond with M. Gray regarding claim objections and language therein regarding reservation of rights (.1); analyze email from CJ Pease regarding details related to former employee and claim (.1).
10/23/23	J.A. Moe, II	0.70	504.00	B320	Review a second time and outline the procedures for the return of Ballots and create outline of "opt out" provisions identified on seven pages of the proposed Joint Disclosure Statement And Chapter 11 Plan Of Liquidation.
10/24/23	R. Wicks	3.60	2,268.00	B320	Prepare solicitation procedures motion.
10/24/23	R. Wicks	0.30	189.00	B320	Prepare order granting motion to combine disclosure statement and plan.
10/24/23	R. Wicks	0.10	63.00	B320	Correspond with T. Moyron regarding plan and liquidating trust agreement.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/23	R. Wicks	0.20	126.00	B320	Correspond with T. Moyron to analyze plan and liquidating trust agreement.
10/25/23	R. Wicks	0.70	441.00	B320	Analyze proposed revisions to combined plan and disclosure statement.
10/25/23	R. Wicks	0.10	63.00	B320	Correspond with G. Miller regarding liquidating trust agreement.
10/25/23	J.A. Moe, II	0.60	432.00	B320	Review again the proposed Combined Disclosure Statement And Chapter 11 Plan Of Liquidation in regard to an Opt Out Form and the procedures for returning Ballots, and create new outline of the Opt Out Form and interlineate into the Opt Out Form the Plan's instructions on returning Ballots.
10/25/23	J.A. Moe, II	1.40	1,008.00	B320	Prepare first draft of the Ballot for Class 3 Claimants.
10/25/23	J.A. Moe, II	0.40	288.00	B320	Research contents of an Opt Out Selection Form for parties to opt out of third party releases in regard to the Chapter 11 Plan Of Liquidation.
10/25/23	T. Moyron	0.40	320.00	B320	Correspond with R. Wicks regarding plan and liquidating trust agreement (.2); analyze R. Wicks email re LTA (.1); analyze email from J. Moe re plan (.1).
10/26/23	T. Moyron	1.40	1,120.00	B320	Call with R. Wicks regarding LTA (.2); analyze issues related to LTA (.3) and correspondence with G. Miller, et al., regarding same (.2); analyze proposed order (.1) and correspond with R. Wicks regarding order (.1); correspond with S. Golden re plan (.1); analyze updated plan and redlines (.4).
10/26/23	J.A. Moe, II	1.40	1,008.00	B320	Revise the first complete draft of the Ballot to vote for or against the proposed Plan Of Liquidation (1.10); revise the second complete draft of the Ballot (.30).
10/26/23	J.A. Moe, II	1.00	720.00	B320	Prepare first rough draft (with inserts to be later added) of the Opt Out Form in regard to Third Party Releases in connection with the proposed Plan Of Liquidation (.60); revise the first complete draft of the Opt Out Form, including the four inserts from the Combined Disclosure Statement And Chapter 11 Plan Of Liquidation (.40).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/23	R. Wicks	0.20	126.00	B320	Call with T. Moyron regarding liquidating trust agreement.
10/26/23	R. Wicks	0.10	63.00	B320	Correspond with J. Moe regarding solicitation procedures.
10/26/23	R. Wicks	0.20	126.00	B320	Analyze correspondence with T. Moyron, G. Miller, et. al regarding liquidating trust agreement.
10/26/23	R. Wicks	0.40	252.00	B320	Prepare order granting motion to combine.
10/26/23	R. Wicks	0.10	63.00	B320	Call with G. Miller regarding liquidating trust agreement.
10/26/23	R. Wicks	2.20	1,386.00	B320	Prepare combined chapter 11 plan and disclosure statement.
10/26/23	R. Wicks	0.20	126.00	B320	Correspond with S. Golden, J. Pomerantz, et. al regarding combined plan and disclosure statement and liquidating trust agreement.
10/26/23	R. Wicks	0.10	63.00	B320	Correspond with I. Lee, CJ Pease, et. al regarding combined plan and disclosure statement and liquidating trust agreement.
10/26/23	G. Medina	0.40	136.80	B320	Review and edit proposed order granting motion to continue and upload with the court.
10/27/23	R. Wicks	0.20	126.00	B320	Call with J. Moe to discuss ballot and opt-out provisions of plan and disclosure statement.
10/27/23	R. Wicks	0.10	63.00	B320	Correspond with S. Golden regarding combined plan and disclosure statement and liquidating trust agreement.
10/27/23	R. Wicks	0.20	126.00	B320	Analyze solicitation procedures with J. Moe.
10/27/23	R. Wicks	0.50	315.00	B320	Call with J. Moe and T. Moyron regarding opt-out provisions and ballot provisions in combined plan and disclosure statement.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/27/23	J.A. Moe, II	0.70	504.00	B320	Prepare for conference call with R. Wicks and T. Moyron on term of the proposed Plan Of Liquidation, including additional review of the provisions related to the return of Ballots and the Opt Out Form (.30); telephone call with R. Wicks and then with Ms. Wicks and T. Moyron reviewing the proposed Plan Of Liquidation, focusing on the procedures for returning Ballots and the provisions in the Plan on the procedures to Opt Out (.30); brief return telephone call with R. Wick on the procedures for the return of Ballots and review of the pages of the proposed Plan that explain the Opt Out procedures (.10).
10/27/23	T. Moyron	1.20	960.00	B320	Analyze R. Wicks, et al., correspondence regarding plan and disclosure statement (.1); attention to solicitation procedures and plan (.6); conference call with J. Moe and R. Wicks regarding opt-out provisions and ballot provisions in combined plan and disclosure statement (.5).
10/30/23	S. Maizel	0.30	240.00	B320	Zoom conference re schedule related to plan confirmation with I. Lee, T. Moyron, etc.
10/30/23	R. Wicks	0.20	126.00	B320	Analyze order granting motion to combine.
10/30/23	R. Wicks	0.20	126.00	B320	Analyze correspondence with S. Golden regarding chapter 11 plan and disclosure statement.
10/30/23	R. Wicks	0.40	252.00	B320	Call with T. Moyron, I. Lee, S. Maizel, and CJ Pease regarding plan and liquidating trust agreement.
10/30/23	R. Wicks	0.30	189.00	B320	Analyze local rules for noticing plan and disclosure statement and conditional approval motion.
10/30/23	T. Moyron	1.00	800.00	B320	Analyze entered order on motion to combine DS and plan and related deadlines (.1); analyze deadlines and related timing matters (.2); correspond with I. Lee and CJ Pease regarding same (.2); conference call regarding DS and plan, upcoming deadlines, board meeting and related documents (.4); correspond with S. Golden re plan (.1).

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/23	T. Moyron	1.70	1,360.00	B320	Correspond with S. Golden re updated plan and LTA and timing of filing (.1); analyze Committee counsel comments to plan and LTA (1.3); correspond with I. Lee, et al., regarding plan, LTA and comments from Committee counsel (.2); prepare email to G. Miller re LTA (.1).
10/31/23	G. Miller	1.00	729.00	B320	Review revised Liquidating Trust Agreement and Combined Plan and Disclosure Statement.
10/31/23	R. Wicks	0.20	126.00	B320	Analyze correspondence with I. Lee, CJ Pease, et. al regarding Ankura's potential comments to the combined plan and disclosure statement and liquidating trust agreement.
10/31/23	R. Wicks	0.40	252.00	B320	Analyze draft ballots and release opt-out election form for combined plan and disclosure statement.
10/31/23	R. Wicks	0.50	315.00	B320	Analyze proposed changes to combined plan and disclosure statement from S. Golden.
10/31/23	R. Wicks	3.90	2,457.00	B320	Prepare combined plan and disclosure statement.
10/31/23	R. Wicks	0.10	63.00	B320	Correspond with S. Ruben and G. Medina regarding deadlines set by order granting motion to combine plan and disclosure statement.
10/31/23	T. Moyron	0.30	240.00	B320	Analyze email from J. Moe and attached ballots and third party release opt out.
10/31/23	S. Maizel	0.70	560.00	B320	Review combined plan and disclosure statement with comments from UCC.
10/31/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with S. Golden, T. Moyron, et. al regarding combined plan and disclosure statement.
10/31/23	R. Wicks	0.10	63.00	B320	Analyze correspondence with T. Moyron, G. Miller, et. al regarding changes to liquidating trust agreement.
	Subtotal	104.10	72,967.60		

Borrego Community Health Foundation
 Matter: 15810746-000002
 Invoice No.: 2687822

November 30, 2023

DHCS - DHCS Litigation

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	T. Moyron	0.20	160.00	DHCS	Confer with R. Wicks, et al., regarding DHCS settlement and dismissal of AP.
10/02/23	S. Maizel	0.20	160.00	DHCS	Review and respond to emails re resolving pending adversary proceeding.
10/02/23	R. Wicks	0.20	126.00	DHCS	Review DHCS settlement agreement regarding dismissal of adversary and vacatur of orders.
10/02/23	R. Wicks	0.20	126.00	DHCS	Correspond with S. Maizel and T. Moyron regarding DHCS settlement agreement and dismissal of adversary and vacatur of orders.
10/03/23	R. Wicks	1.80	1,134.00	DHCS	Prepare joint stipulation vacating order and dismissing adversary proceeding.
10/03/23	R. Wicks	0.10	63.00	DHCS	Correspond with T. Moyron and S. Maizel regarding joint stipulation vacating order and dismissing adversary proceeding.
10/06/23	R. Wicks	0.10	63.00	DHCS	Correspond with S. Golden and D. Wessel regarding stipulation vacating orders and dismissing adversary in accordance with settlement.
10/06/23	R. Wicks	0.20	126.00	DHCS	Prepare stipulation vacating orders and dismissing adversary proceeding.
10/11/23	T. Moyron	0.60	480.00	DHCS	Call with R. MacIsaac, J. LaMagna, T. Waters, et al., regarding DHCS, TSA, billing, and related matters.
10/14/23	R. Wicks	0.20	126.00	DHCS	Correspond with S. Maizel, D. Wessel, et. al regarding stipulation to vacate orders and dismiss adversary proceeding.
10/16/23	R. Wicks	0.10	63.00	DHCS	Correspond with S. Golden regarding stipulation vacating orders and dismissing adversary proceeding.
10/16/23	R. Wicks	0.60	378.00	DHCS	Prepare order approving stipulation to vacate orders and dismiss adversary proceeding.
10/17/23	R. Wicks	0.10	63.00	DHCS	Correspond with T. Moyron and S. Maizel regarding stipulation to vacate order and dismiss adversary proceeding.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/17/23	R. Wicks	0.40	252.00	DHCS	Prepare order granting stipulation to vacate orders and dismiss adversary proceeding.
10/17/23	R. Wicks	0.50	315.00	DHCS	Finalize and file stipulation to vacate orders and dismiss adversary proceeding.
10/17/23	S. Maizel	0.20	160.00	DHCS	Review and revise stipulation vacating memorandum and dismissing adversary proceeding.
10/18/23	R. Wicks	0.20	126.00	DHCS	Analyze order vacating adversary orders and dismissing adversary proceeding.
10/18/23	R. Wicks	0.20	126.00	DHCS	Correspond with T. Moyron and S. Maizel regarding order vacating adversary orders and dismissing adversary proceeding and dismissal of appeal.
10/18/23	R. Wicks	0.10	63.00	DHCS	Correspond with D. Wessel, S. Golden, et. al. regarding order vacating adversary orders and dismissing adversary proceeding and dismissal of appeal.
10/18/23	T. Moyron	0.20	160.00	DHCS	Correspond with R. Wicks re order vacating findings of fact and dismissing adversary.
10/19/23	R. Wicks	0.10	63.00	DHCS	Correspond with D. Wessel regarding dismissal of appeal.
10/25/23	R. Wicks	0.10	63.00	DHCS	Analyze correspondence with D. Wessel regarding stipulation to dismiss appeal.
10/25/23	R. Wicks	0.20	126.00	DHCS	Correspond with R. MacIsaac regarding executed DHCS settlement.
10/25/23	T. Moyron	0.20	160.00	DHCS	Analyze email from D. Wessel re join motion to dismiss bankruptcy appeal (.1); analyze email from R. MacIsaac regarding DHCS settlement (.1).
10/26/23	R. Wicks	0.50	315.00	DHCS	Analyze proposed stipulation to dismiss appeal.
10/26/23	R. Wicks	1.00	630.00	DHCS	Prepare stipulation to dismiss appeal.
10/26/23	S. Maizel	0.50	400.00	DHCS	Review and revise joint motion to dismiss DHCS appeal.
10/28/23	R. Wicks	0.10	63.00	DHCS	Correspond with S. Maizel and T. Moyron regarding stipulation to dismiss appeal.
10/31/23	R. Wicks	0.10	63.00	DHCS	Correspond with D. Wessel et. al regarding stipulation to dismiss appeal.

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/23	R. Wicks	0.80	504.00	DHCS	Prepare stipulation to dismiss appeal.
	Subtotal	10.00	6,657.00		

EMP - Employee matters

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/23	R. Wicks	1.40	882.00	EMP	Prepare memorandum in support of insider compensation.
	Subtotal	1.40	882.00		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
J. Harrington	\$ 800.00	1.30	\$ 1,040.00
S. Maizel	\$ 800.00	16.80	\$ 13,440.00
T. Moyron	\$ 800.00	26.90	\$ 21,520.00
G. Miller	\$ 729.00	35.70	\$ 26,025.30
L. Macksoud	\$ 729.00	15.90	\$ 11,591.10
R. Richards	\$ 800.00	1.70	\$ 1,360.00
S. McCandless	\$ 800.00	7.30	\$ 5,840.00
J.A. Moe, II	\$ 720.00	8.10	\$ 5,832.00
R. Wicks	\$ 630.00	73.20	\$ 46,116.00
S. Ruben	\$ 499.50	0.60	\$ 299.70
G. Medina	\$ 342.00	<u>3.00</u>	<u>\$ 1,026.00</u>
Totals		190.50	\$ 134,090.10

Borrego Community Health Foundation
Matter: 15810746-000002
Invoice No.: 2687822

November 30, 2023

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B100	Administration	1,040.00
B110	Case Administration	11,232.70
B120	Asset Analysis and Recovery	240.00
B130	Asset Disposition	5,520.00
B160	Fee/Employment Applications	6,307.80
B185	Assumption/Rejection of Leases and Contracts	606.00
B210	Business Operations	252.00
B230	Financing/Cash Collections	480.00
B300	Claims and Plan	99.90
B310	Claims Administration and Objections	27,805.10
B320	Plan and Disclosure Statement (incl. Business Plan)	72,967.60
DHCS	DHCS Litigation	6,657.00
EMP	Employee matters	882.00
	Total This Matter	\$134,090.10

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
9/30/2023	LITIGATION SUPPORT VENDORS PACER-FEES	30.00
	SUBTOTAL	30.00
10/2/2023	WESTLAW WICKS\REBECCA	375.00
10/3/2023	WESTLAW WICKS\REBECCA	225.00
10/13/2023	WESTLAW WICKS\REBECCA	975.00
	SUBTOTAL	1,575.00
	Total Disbursements	\$1,605.00

Borrego Community Health Foundation November 30, 2023
Invoice #: 2687822

COMBINED TOTALS

Total Hours	190.50
Fee Total, all Matters	\$ 134,090.10
Disbursement Total, all Matters	\$ 1,605.00
Invoice Total, all Matters	<u>\$ 135,695.10</u>
Amounts Received, Available to Apply Against Current or Future Invoices	100,000.00
Amount Due	\$ 135,695.10

DENTONS

of 36
 SNR Denton US LLP
 601 S. Figueroa Street
 Suite 2500
 Los Angeles, California 90017-5704

snrdenton.com

Isaac Lee
 Chief Restructuring Officer
 Borrego Community Health Foundation
 isaac.lee@ankura.com

November 30, 2023

Client #: 15810746

 Statement of Account

According to our records, as of November 30, 2023, the amounts shown below are outstanding.
 If your records are not in agreement with ours, please call us. Thank you.

<u>Date</u>	<u>Invoice No.</u>	<u>Invoice Amount</u>	<u>Payments/ Adjustments</u>	<u>Total</u>
09/30/23	2672266	\$ 98,005.95	\$ 0.00	\$ 98,005.95
10/31/23	2679858	\$ 129,875.45	\$ 0.00	\$ 129,875.45
11/30/23	2687822	\$ 135,695.10	\$ 0.00	\$ 135,695.10
Total Outstanding Invoices				<u>\$ 363,576.50</u>
Credits On Account				\$ 100,000.00

Questions should be directed to:

S. Maizel
 at 1 213 623 9300

Federal Tax I.D. Number 36-1796730